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July 20, 2005

Ex Parte

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 02-353, Service Rules for Advanced Wireless Service in the
1.7 and 2.1 GHz Bands

Dear Ms. Dortch:

On July 19, 2005, Charla Rath and Derek Mullins met with Commissioner Jonathan Adelstein, his Senior Legal Advisor, Barry Ohlson, and his legal intern Lindsey Tonsager to discuss Verizon Wireless' proposal to revise the Advanced Wireless Services (AWS) band plan as indicated in the attached and for the reasons set forth in our May 27, 2005 ex parte filing in this docket.

We noted the importance of placing the MSA/RSA license in the A Block so that bidders could efficiently aggregate the EA and REAG "building blocks." We also noted that Verizon Wireless initially supported the adoption of a 30 MHz license and that it still believes it is important that the Commission adopt a band plan, such as the attached, that permits carriers to acquire enough contiguous spectrum to provide capacity for more advanced services. We would not recommend that the Commission adopt a plan that reduces to one the number of 20 MHz REAGs because it would significantly reduce bidders' flexibility. However, we noted that if the Commission were to adopt a plan with only one 20 MHz REAG, it should place it between a 10 MHz REAG and a 10 MHz EA, thus permitting the efficient aggregation of the 20 MHz REAG with *either* another REAG or an EA. Though not ideal, in this manner the Commission could provide for greater flexibility and would preserve the rationale for including both a 20 MHz REAG and a 30 MHz REAG in its original band plan.¹

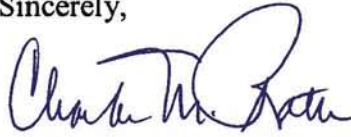
¹ Larger spectrum blocks enable "a broader range of broadband services, including Internet access at faster speeds" and "provide operators with additional capacity, and, importantly, with greater flexibility." See *AWS Service Rules* at ¶44.

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Pursuant to section 1.1206(b)(2) of the Commission's rules, an electronic copy of the letter is being filed for inclusion in the above-referenced docket. Please direct any questions regarding this filing to the undersigned.

Sincerely,

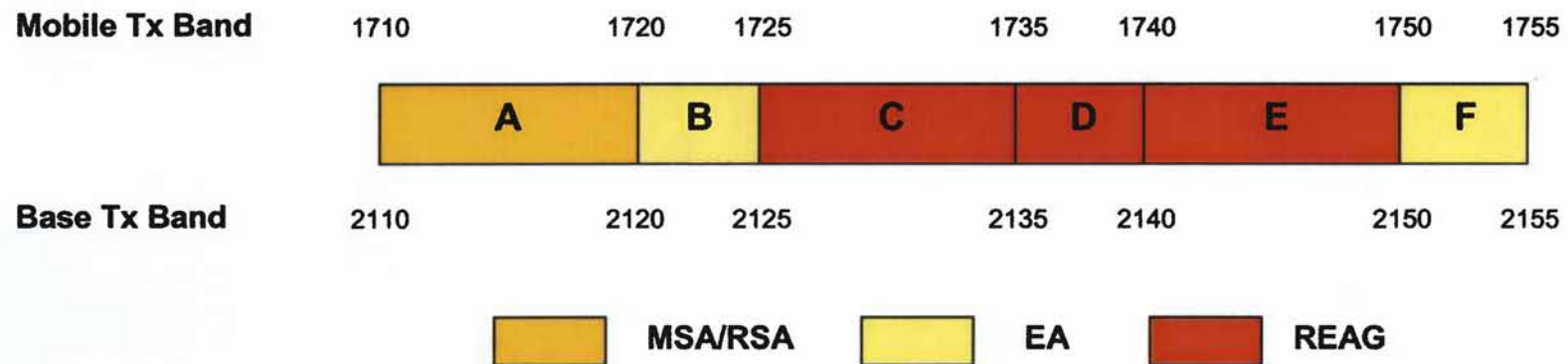
A handwritten signature in dark ink, appearing to read "Charla M. Rath". The signature is fluid and cursive, with the first name "Charla" being the most prominent part.

Charla M. Rath

Attachment

cc: Commissioner Jonathan Adelstein
Barry Ohlson
Lindsey Tonsager

Proposed Band Plan for Advanced Wireless Services (AWS) in the 1710-1755 / 2110-2155 MHz band



- Facilitates more efficient aggregation of spectrum blocks
- Provides more flexibility for prospective licensees
- Supports acquisition of 30 MHz blocks without requiring 30 MHz licenses
- Accommodates rural carriers' desire for 20 MHz MSA/RSA licenses